

THE URBAN LAW FIRM

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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE BOARD OF TRUSTEES OF THE
CONSTRUCTION INDUSTRY AND
LABORERS HEALTH AND WELFARE
TRUST; THE BOARD OF TRUSTEES OF
THE CONSTRUCTION INDUSTRY AND
LABORERS JOINT PENSION TRUST; THE
BOARD OF TRUSTEES OF THE
CONSTRUCTION INDUSTRY AND
LABORERS VACATION TRUST; THE
BOARD OF TRUSTEES OF SOUTHERN
NEVADA LABORERS LOCAL 872
TRAINING TRUST,

Plaintiffs,

vs.

SAFETY SEALED WATER SYSTEMS LLC,
a Domestic Limited-Liability Company;
CRAIG EHRNREITER, individually; LORA
LEE EHRNREITER, individually; and
SCOTT HEFTY, individually

Defendants.

CASE NO.: 2:15-cv-00180-APG-VCF

**MOTION TO SET ANSWERING
DEADLINE FOR CRAIG EHRNREITER**

Plaintiffs, THE BOARD OF TRUSTEES OF THE CONSTRUCTION INDUSTRY AND
LABORERS HEALTH AND WELFARE TRUST; THE BOARD OF TRUSTEES OF THE
CONSTRUCTION INDUSTRY AND LABORERS JOINT PENSION TRUST; THE BOARD OF
TRUSTEES OF THE CONSTRUCTION INDUSTRY AND LABORERS VACATION TRUST; THE

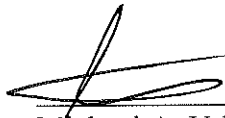
1 BOARD OF TRUSTEES OF SOUTHERN NEVADA LABORERS LOCAL 872 TRAINING TRUST
 2 (hereinafter "Trustees"), by and through their counsel of record, The Urban Law Firm, hereby move
 3 this Court to set the deadline for Craig Ehrnreiter to Answer the Complaint by **March 14, 2016**.

4 Pursuant to the Court's Minutes of February 9, 2016 (Dkt. #49), the parties were supposed to
 5 submit a stipulation with a proposed deadline for the filing of the answer. To date, Craig Ehrnreiter has
 6 failed to file an Answer or inform this office as to when his Answer will be submitted. Undersigned
 7 counsel has contacted Mr. Ehrnreiter several times but he has refused to stipulate to a deadline and
 8 settlement discussions have ceased. See Seth T. Floyd Declaration at ¶5. Currently, dispositive motions
 9 are due in this case by March 21, 2016 (Dkt. #50).

10 This Motion is based on the Declaration of Seth T. Floyd., Esq., pleadings on file in this matter,
 11 and the argument of counsel during any hearing this Court may hold.

12 Dated: February 29, 2016

THE URBAN LAW FIRM



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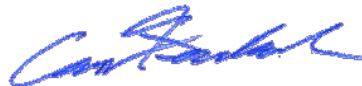
Counsel for Plaintiff

19 IT IS HEREBY ORDERED that Craig
 20 Ehrnreiter must respond to Plaintiff's
 21 Complaint by March 21, 2016.

22 Dispositive motions due by March
 23 28, 2016.

24 The Clerk of Court is directed to
 25 mail a copy of this Order to Craig
 26 Ehrnreiter.

IT IS SO ORDERED.



UNITED STATES ~~DISTRICT~~ JUDGE
 Magistrate

Dated: March 11, 2016

CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2016, I electronically filed the preceding **MOTION TO SET ANSWERING DEADLINE FOR CRAIG EHRNREITER** with the Clerk of the Court using the CM/ECF system and I hereby certify that I have mailed by United States Postal Service First Class Mail the document to the following non-CM/ECF participant(s):

Craig Ehnreiter
8227 Coyado Drive
Las Vegas, NV 89123
craig@tomarco.com
Defendant


An employee of **THE URBAN LAW FIRM**

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CONSTRUCTION INDUSTRY AND
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TRUST; THE BOARD OF TRUSTEES OF
THE CONSTRUCTION INDUSTRY AND
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THE BOARD OF TRUSTEES OF THE
CONSTRUCTION INDUSTRY AND
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BOARD OF TRUSTEES OF SOUTHERN
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TRAINING TRUST,

Plaintiffs,

vs.

SAFETY SEALED WATER SYSTEMS
LLC, a Domestic Limited-Liability
Company; CRAIG EHRNREITER,
individually; LORA LEE EHRNREITER,
individually; and SCOTT HEFTY,
individually

Defendants.

CASE NO: 2:15-cv-00180-APG-VCF

**DECLARATION OF SETH T. FLOYD IN
SUPPORT OF MOTION TO SET
ANSWERING DEADLINE FOR CRAIG
EHRNREITER**

I, Seth T. Floyd, declare and state as follows:

1. I am an Associate with The Urban Law Firm and I am duly licensed to practice law in the State of Nevada and before this U.S. District Court. I am counsel of record for the Plaintiffs and I am the attorney responsible for the prosecution of this action.

1 2. I make this Declaration in support of the Plaintiffs' Motion To Set Answering
2 Deadline for Craig Ehrnreiter.

3 3. I make all statements in this Declaration based upon my personal knowledge unless
4 stated otherwise herein.

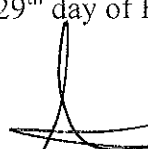
5 4. Pursuant to the Court's Minutes of February 9, 2016 (Dkt. #49), if an agreement is
6 not reached, the parties shall submit a stipulation with a proposed deadline for the filing of the
7 answer.

8 5. On February 18, 2016, I contacted Craig Ehrnreiter via e-mail to inquire as to the
9 date he would submit his Answer. I have also spoken to him on the phone several times but he has
10 refused to provide an answering deadline. Settlement discussions have also stalled.

11 6. Accordingly, I respectfully request that this Court set an answering deadline
12 preferably on or before March 14, 2016.

13 I declare under penalty of perjury under the laws of the United States and the State of
14 Nevada that the foregoing is true and correct, and if called as a witness, I could and would
15 competently testify thereto.

16 Executed at Las Vegas, Nevada on this 29th day of February, 2016.

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19 _____
20 SETH T. FLOYD, Nevada State Bar No. 11959
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